

JAP:DAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-11-034

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

LISA ODESSA HOLDER,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

JOHN LATTUCA, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about January 13, 2011, within the Eastern District of New York and elsewhere, defendant LISA ODESSA HOLDER did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about November 1, 2010, LISA ODESSA HOLDER arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Caribbean Airlines Flight 424 from Georgetown, Guyana.

2. The defendant was selected for a Customs and Border Protection ("CBP") examination. The defendant presented for inspection one blue "New Way" suitcase. The defendant answered in the affirmative when asked if the bag and its contents belonged to her.

3. During an inspection of the defendant LISA ODESSA HOLDER's bag, a CBP officer removed two "Fernleaf" powdered milk cans. A white powdery substance was discovered in the cans, which field-tested positive for the presence of cocaine.

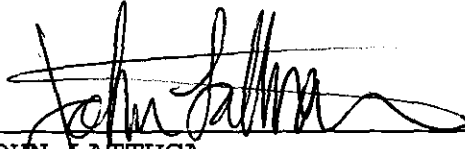
4. The CBP officer also discovered packages containing a white powdery substance within a false bottom inside the suitcase. That substance also field-tested positive for the presence of cocaine.

5. The total approximate gross weight of the cocaine found in the defendant LISA ODESSA HOLDER's bag is approximately

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

9,110 grams.

WHEREFORE, your deponent respectfully requests that
defendant LISA ODESSA HOLDER be dealt with according to law.



JOHN LATTUCA
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

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